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5 Attorney for Plaintiff Rodolfo F. Mendoza
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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
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11 RODOLFO FIDEL MENDOZA,
12 individually, and on behalf of a class of
similarly situated individuals,

13 Plaintiff,

14 v.
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16 GENERAL MOTORS, LLC,

17 Defendant.
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CASE NO. CV 10-2683 AHM (VBK)

Hon. A. Howard Matz

**STIPULATION TO CONTINUE
DEADLINE FOR FILING CLASS
CERTIFICATION MOTION**

1 Plaintiff Rodolfo Fidel Mendoza (“Plaintiff”) and General Motors, LLC
2 (“GM”), through their undersigned counsel, hereby stipulate and agree as follows:

3 WHEREAS, Plaintiff served a Class Action Complaint (“complaint”) in the
4 matter captioned *Mendoza et al. v. General Motors, LLC* (Case No. CV-10-2683
5 AHM (VBK)) on GM on or about May 1, 2010;

6 WHEREAS, GM’s response to the complaint by stipulation of the parties
7 currently is due on or before June 21, 2010;

8 WHEREAS, pursuant to Central District Local Rule 23-3, Plaintiff is required
9 to file his Motion for Class Certification by July 30, 2010, which is ninety (90) days
10 from the service of the complaint;

11 WHEREAS, GM currently anticipates that it will file a motion to dismiss
12 and/or a motion to transfer to the Southern District of New York on or before June
13 21, 2010;

14 WHEREAS, it is highly unlikely that the complaint will be at issue on the
15 date Plaintiff’s class certification motion currently is due on July 30, 2010;

16 WHEREAS, the Court has not yet set a Rule 26 scheduling conference in this
17 matter and discovery is not likely to commence under governing Federal Rules and
18 Central District Local Rules until after the parties’ mutual exchange of initial
19 disclosures and Rule 16 meeting of counsel;

20 WHEREAS, the Court has not issued an order changing the deadline for a
21 class certification motion under Central District Local Rule 23-3, and additional
22 time is necessary to resolve GM’s anticipated challenges to Plaintiff’s complaint,
23 and to initiate and complete pre-certification discovery;

24 IT IS HEREBY STIPULATED AND AGREED that the Court may enter an
25 order continuing the July 30, 2010 deadline for Plaintiff to file a Motion for Class
26 Certification, and at the initial case scheduling conference, the Court can set a
27 briefing schedule for class certification as agreed to by the parties or as ordered by
28 the Court.

1 DATED: June 17, 2010

GREGORY R. OXFORD
ISAACS CLOUSE CROSE & OXFORD LLP

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By: /s/
Gregory R. Oxford
Attorneys for General Motors, LLC

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DATED: June 17, 2010

ROBERT L. STARR
THE LAW OFFICE OF ROBERT L. STARR

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By: /s/
Robert L. Starr
Attorneys for Plaintiff

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1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
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4 MARTIN EHRLICH, individually and
5 on behalf of a class of similarly situated
6 individuals,

7 Plaintiff,

8 v.

9 BMW OF NORTH AMERICA, LLC,

10 Defendant.
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CASE NO. CV 10-2683 AHM (VBK)

Hon. A. Howard Matz

**[PROPOSED] ORDER
CONTINUING DEADLINE FOR
FILING CLASS CERTIFICATION
MOTION**

13 The Court has reviewed and considered the parties' June 17, 2010 Stipulation
14 To Continue Deadline For Filing Class Certification Motion ("Stipulation"). Based
15 on the Stipulation and GOOD CAUSE APPEARING, it is hereby ordered that
16 Plaintiff's July 31, 2010 deadline for filing a motion for class certification pursuant
17 to Central District Local Rule 23-3 is hereby continued. At the initial case
18 scheduling conference, the Court will establish a briefing schedule for class
19 certification as agreed to by the parties, or as otherwise ordered by the Court.
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22 DATED: June , 2010

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24 Hon. A. Howard Matz
25 United States District Court Judge
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